

Gia N. Marina  
Nevada Bar No. 15276  
**CLARK HILL PLLC**  
1700 S. Pavilion Center Drive, Suite 500  
Las Vegas, Nevada 89135  
E-mail: gmarina@clarkhill.com  
Telephone: (702) 862-8300  
Facsimile: (702) 778-9709

Zachary A. McEntyre (*pro hac vice*)  
Billie B. Pritchard (*pro hac vice*)  
**KING & SPALDING LLP**  
1180 Peachtree Street  
Atlanta, GA 30309  
Telephone: (404) 572-4600  
Facsimile: (404) 572-5100  
zmcentyre@kslaw.com  
bpritchard@kslaw.com

*Attorneys for Defendant Equifax Information Services LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

THERESA STONE, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

**Case No. 2:24-CV-00195-GMN-EJY**

**STIPULATION TO EXTEND TIME  
FOR DEFENDANT EQUIFAX  
INFORMATION SERVICES LLC TO  
ANSWER COMPLAINT  
(Third Request)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Defendant Equifax Information Services LLC (“Equifax”), through its undersigned counsel, and Plaintiff Theresa Stone, through her undersigned counsel, hereby stipulate and agree, subject to the Court’s approval, to extend the deadline for Equifax to answer Plaintiff’s Complaint, as follows:

1. On April 5, 2024, Equifax filed its Motion to Dismiss Complaint and Memorandum of Points and Authorities in Support Thereof. Dkt. 18.

1           2.       On January 30, 2025, the Court denied Equifax's Motion to Dismiss. Dkt. 46.

2           3.       Equifax's answer to Plaintiff's Complaint is currently due on February 13, 2025.

3           4.       On February 7, 2025, counsel for Equifax contacted counsel for Plaintiff to request  
4 an additional three weeks to submit its answer to the Complaint. The request was made to allow  
5 Equifax additional time to investigate the allegations in the Complaint and prepare an appropriate  
6 response, and to accommodate Equifax's counsel's other professional commitments. Plaintiff's  
7 counsel indicated that she does not oppose Equifax's request.

8           5.       Accordingly, all parties hereby stipulate, subject to the Court's approval, that  
9 Equifax's answer to Plaintiff's Complaint is due March 6, 2025. This is the third stipulation for  
10 extension of time Equifax has requested to respond to Plaintiff's Complaint, and the first request  
11 postdating the Court's ruling on Equifax's Motion to Dismiss. This stipulation is filed in good faith  
12 and not intended to cause delay.

13           //

1           **WHEREFORE**, Defendant Equifax Information Services LLC respectfully requests that  
2 the Court grant this Stipulation and thereby extend its time to file its answer to Plaintiff's Complaint  
3 to March 6, 2025.

4           Respectfully submitted on February 10, 2025.

5           CLARK HILL PLLC

FREEDOM LAW FIRM

6           By: /s/ Gia N. Marina

By: /s/ George F. Carpinello

7           Gia N. Marina

George Haines

8           Nevada Bar No. 15276

Nevada Bar No. 9411

9           1700 S. Pavilion Center Drive, Ste. 500

Gerardo Avalos

10          Las Vegas, NV 89135

Nevada Bar No. 15171

8985 South Eastern Ave., Suite 350

Las Vegas, Nevada 89123

info@freedomlegalteam.com

11          Zachary A. McEntyre (*pro hac vice*)

12          Georgia Bar No. 653571

13          Billie B. Pritchard (*pro hac vice*)

14          Georgia Bar No. 460789

15          KING & SPALDING LLP

16          1180 Peachtree Street

17          Atlanta, GA 30309

18          Attorneys for Defendant Equifax Information  
19          Services LLC

MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC

20          Scott C. Harris (*pro hac vice*)

21          North Carolina Bar No. 35328

22          900 W. Morgan Street

23          Raleigh, NC 27603

24          sharris@milberg.com

25          Gary M. Klinger (*pro hac vice*)

26          227 Monroe Street, Suite 2100

27          Chicago, IL 60606

28          gklinger@milberg.com

George F. Carpinello (*pro hac vice*)

Adam R. Shaw (*pro hac vice*)

BOIES SCHILLER FLEXNER LLP

30 S. Pearl St. 12th Floor

Albany, NY 12207

gcarpinello@bsflp.com

ashaw@bsflp.com

Attorneys for Plaintiff

IT IS SO ORDERED.



ELAYNA J. YOUCHAK

UNITED STATES MAGISTRATE JUDGE

Date: February 10, 2025